Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Effects of Broadband Communications Networks	)	PS Docket No. 10-92
Of Damage to or Failure of Network Equipment	)	
Or Severe Overload	)	
	)	

REPLY COMMENTS OF
PCIA—THE WIRELESS INFRASTRUCTURE ASSOCIATION

PCIA—The Wireless Infrastructure Association ("PCIA") hereby submits these reply comments in response to the above captioned Federal Communications Commission ("FCC" or "Commission") *Notice of Inquiry* regarding broadband network survivability.[1]

I. INTRODUCTION

Commenters in this docket have established that wireless broadband networks are highly survivable, and that cell sites are not single points of failure within wireless networks. Further, it is clear from the initial comments that wireless service and infrastructure providers have in place effective plans to respond to any network outage and are able to mobilize resources quickly to respond to a widespread wireless network outage or spikes in usage.[2] Wireless network survivability and outage response plans are the product of effective private planning and voluntary participation in standards setting organizations, and public-private efforts at establishing guidelines and best practices. The Commission should withhold from uniform

[1] *In re* Effects on Broadband Communications Networks Of Damage to or Failure of Network Equipment Or Severe Overload, *Notice of Inquiry*, FCC 10-62, PS Docket No. 10-92 (rel. Apr. 21, 2010) ("*NOI*").
[2] *See* Comments of CTIA—The Wireless Association, FCC 10-62, PS Docket No. 10-92, at 5-7 (filed June 25, 2010) ("CTIA"); Comments of AT&T, FCC 10-62, PS Docket No. 10-92, at 11-16 (filed June 25, 2010) ("AT&T"); Comments of Verizon, FCC 10-62, PS Docket 10-92, at 3-5 (filed June 25, 2010) ("Verizon"); Comments of Sprint Nextel, FCC 10-62, PS Docket No. 10-92, at 6-7 (filed June 25, 2010) ("Sprint").

prescriptive regulation, and continue to allow wireless network and infrastructure providers to establish effective individualized solutions to ensure network survivability.

II. WIRELESS NETWORKS ARE HIGHLY SURVIVABLE, AND IN THE EVENT OF NETWORK OUTAGES OR USAGE SPIKES, WIRELESS SERVICE AND INFRASTRUCTURE PROVIDERS HAVE IN PLACE EFFECTIVE PLANS TO QUICKLY RESTORE SERVICE

Wireless network architecture and the standards for the design and construction of cell sites ensure that cell sites are likely not individual points of failure within wireless networks.[3] Further, in the event of a widespread network failure or usage spike, wireless service and infrastructure providers have in place effective response plans to ensure that service is continuity maintained or quickly restored.[4]

No individual cell site is the same, and each may serve a different purpose within a wireless network.[5] Regardless of the purpose of the cell site, cell towers are engineered, designed, and constructed in compliance with standards that ensure a high level of survivability.[6] Further, as explained by Verizon, AT&T and CTIA, wireless network design requires overlap between the footprints of cell sites, which by its nature ensures that service is maintained in the rare event of a site failure.[7]

In the event of a network outage that results in the inability of users to access wireless services, wireless service and infrastructure providers have in place operational and technical procedures to ensure that access is quickly restored.[8] For example, many cell sites are monitored 24 hours a day, seven days a week from a Network Operations Center ("NOC"). The NOC collects a variety of data on the sites within a given geographic area. If the NOC operators detect

[3] *See* Comments of PCIA—The Wireless Infrastructure Association, FCC 10-62, PS Docket No. 10-92, at 2-6 (filed June 25, 2010) ("PCIA").
[4] Verizon at 3-5; CTIA at 5-7; AT&T at 11-16; Sprint at 6-7.
[5] *See* Comments of MetroPCS, FCC 10-62, PS Docket No. 10-92, at 3 (filed June 25, 2010).
[6] *See* PCIA at 4-5.
[7] Verizon at 4; CTIA at 7-9; AT&T at 6-8.
[8] *See* CTIA at 5-7; AT&T at 11-16; Verizon at 3-5; Sprint at 6-7.

a problem at any site, the infrastructure or service provider will have in place a protocol to respond quickly and effectively to the problem. Furthermore, wireless service and infrastructure providers are able to quickly mobilize temporary cell sites either before or quickly following a network outage or anticipated usage spike.[9]

All of these efforts result in wireless networks that are highly survivable, and ensure that individual cell sites are likely not individual points of failure within a wireless network. This is achieved without uniform prescriptive rules, but rather with the flexibility to adopt innovative solutions tailored to individual networks and cell sites, and with voluntary private and public-private efforts to set standards and best practices.

III. THE COMMISSION SHOULD FOSTER VOLUNTARY PRIVATE AND PUBLIC-PRIVATE EFFORTS TO ENSURE NETWORK SURVIVABILITY WITHOUT UNIFORM PRESCRIPTIVE REGULATIONS

Wireless networks are highly variable in design and technology. As explained, wireless network design relies on a large number of different types of cell sites serving various purposes within a given network. Wireless service and infrastructure providers, therefore, must take an individualized approach to ensure survivability of their networks. These efforts are further enhanced by participation in private standards organizations and public-private best practice-setting efforts, and result in highly survivable wireless networks.

As explained by PCIA in its initial comments, cell towers are engineered, designed, and constructed in compliance with standards established by private standards organizations such as TIA, ACI, and ASCE.[10] Further, the wireless industry participates in a variety of other private and public-private efforts to establish and share best practices for ensuring wireless network survivability. The wireless industry participates in the National Coordinating Center for

[9] *See* CTIA at 5-7; AT&T at 11-16; Verizon at 3-5; Sprint at 6-7.
[10] PCIA at 4-5.

Telecommunications, the Communications Sector Coordinating Council, the Network Reliability and Interoperability Council, and the Commission's own Communications Security, Reliability, and Interoperability Council, among others.[11]

As the Alliance for Telecommunications Industry Solutions—a global standards setting organization—notes in its comments: "The success of . . . Best Practices in enhancing network reliability stems from their development in a voluntary and consensus-based environment that encourages a pooling of expertise that is used to both identify and thoroughly examine potential Best Practices."[12] These efforts are effective at ensuring wireless network survivability, and the Commissions should encourage voluntary private and public-private standards and best practice setting.

IV. CONCLUSION

For the foregoing reasons, the Commission should avoid prescriptive uniform regulations for wireless network survivability.

Respectfully submitted,

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[11] *See* Verizon at 6-7; CTIA at 4-6; AT&T at 24-25; Comments of ATIS, FCC 10-62, PS Docket No. 10-92, at 8-10 (filed June 25, 2010).
[12] ATIS at 8-9.